

WESTCOAST BLACK THEATRE TROUPE

*Sarasota's
most electrifying
theatre*

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December 23, 2014

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Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166
Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel,
Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Westcoast Black Theatre, located in Sarasota, Florida, that provides approximately 225 performances a year to 36,000+ audience members[– Our mission is to produce plays that promote and celebrate the African American experience, attract diverse audiences, while using its productions as a vehicle for supporting African American artists and building the self-esteem of African American youth], I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

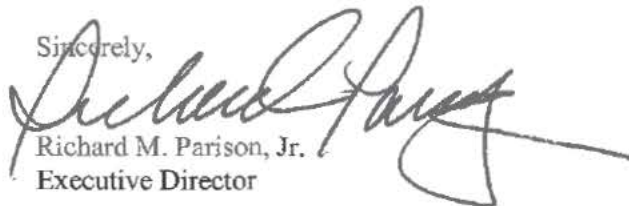
Information for your knowledge about our use of wireless technology:

- We utilize wireless microphones at our theater.
- We use about 20 wireless microphones in a performance.
- We always use wireless microphones in each of our performances.
- We use: Low UHF (channels 14-36, 470 to 608 MHz) They are able to tune to more than one frequency. Tuning Ability: They are all 470-490
- Our wireless devices are all analog.
- We own our microphones.
- Reasonable life expectancy is about 8-10 years.
- We never had any devices in the 700 MHz band.
- To ensure that wireless microphone users transition to new, more efficient devices to the full extent possible – the FCC can help make the devices more cost effective.
- We don't use the TV band equipment at this time.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Richard M. Parison, Jr.
Executive Director